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Docket No.: 52-026

ND-23-0110
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC C.2.6.09.06 [Index Number 666]

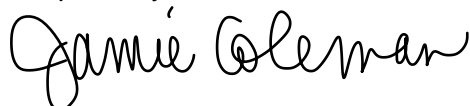
Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.06 [Index Number 666]. This ITAAC confirms that the access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,



Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC C.2.6.09.06 [Index Number 666]

JMC/CIP/sfr

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cc: Regional Administrator, Region II
 Director, Office of Nuclear Reactor Regulation (NRR)
 Director, Vogtle Project Office NRR
 Senior Resident Inspector – Vogtle 3 & 4

**Southern Nuclear Operating Company
ND-23-0110
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC C.2.6.09.06 [Index Number 666]**

ITAAC Statement

Design Commitment

6. An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas and vital areas without escort.

Inspections/Tests/Analyses

A test of the access control system with numbered picture badges will be performed.

Acceptance Criteria

The access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization.

ITAAC Determination Basis

A test of the access control system with numbered picture badges was performed to confirm that the system can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization, and satisfy the applicable access control requirements of the Vogtle Electric Generating Plant (VEGP) Units 1-4 Physical Security Plan associated with 10 CFR Part 73.55(g)(6)(ii). The VEGP Unit 4 Plant Security System ITAACs only cover the Unit 4 plant security system design commitment scope.

A test of the access authorization system was performed using numbered picture test badges prepared both with and without unescorted access authorization to the protected area and vital areas. The test badges and associated biometric data were prepared and controlled per the applicable station procedures. Test badges and associated biometric data were used to attempt access to the protected area, and test badges were used to attempt access to a vital area. The test confirmed the access authorization system will only allow access to the protected area and vital area for which the test badges are authorized. Similarly, the test confirmed the access authorization system will not allow access for test badges that do not have authorization. The testing confirmed the test badge access successes and failures are recorded by the access authorization system. The testing also confirmed the Central and Secondary Alarm Stations received alarms following multiple unauthorized test badge access attempts and provided the protected or vital area test location causing the alarm. The test procedure included a record of protected and vital area test results, as well as confirmation that the access authorization system appropriately annunciated and accurately recorded test results.

The numbered picture badge access control system test results are documented in SV4-SES-ITR-800666 (Reference 1) and confirm that the access authorization system with numbered picture badges can identify and authorize Unit 4 vital area access only to those personnel with unescorted access authorization to this area. Reference 2 confirms that the access authorization system with numbered picture badges can identify and authorize protected area access only to those personnel with unescorted access authorization to this area.

References 1 and 2 are available for NRC inspection as part of the Unit 4 C.2.6.09.06 ITAAC Completion Package (Reference 3).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.2.6.09.06 (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC C.2.6.09.06 was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-SES-ITR-800666, Unit 4 ITAAC 666 Access Authorization Test: ITAAC C.2.6.09.06, Revision 0
2. SV3-SES-ITR-800666, Unit 3 ITAAC 666 Access Authorization Test: ITAAC C.2.6.09.06, Revision 0
3. C.2.6.09.06-U4-CP-Rev0, ITAAC Completion Package